

In The United States District Court
For The Middle District of Pennsylvania

Synquila Williams prose
Plaintiff
V.

John E wetzel Secretary of
the Department of corrections
Sued in his offical capacity. David
Radziewicz State Prea Coordinator
for the Department of corrections
to be sued in his individual capacity.
Paul Noel chief medical Director for the
department of corrections to be sued
in his offical capacity. Former Sci muncy
Super Intendant Robert Smith is to be
sued in his offical and individual
capacity. Correct care solutions Blair
maorison is to be sued individual and
offical capacity. Sci muncy CO
Donoronama is to be sued in his
individual and offical capacity. CO
Starks is to be sued in her individual
and offical capacity. Psychologist
Mirranda Dimoff is to be sued
in her offical and individual capacity.
And the new super intendant Debra Nicholas
to be sued in her individual und offical capacity

To the above named defendants you are hereby
summoned and required to serve upon plaintiffs whose
address is - Synquella Williams

6454 State Route 405

muncy PA 17554

and answer to the complaint which is here with
served upon you, within 20 days after service
of this summons upon you. Exclusive of the day
of service or 40 days if the U.S. government or
office agent thereof is a defendant. If you fail to
do so judgment by default will be taken against
you for the relief demanded in the complaint.

Clerk of Court

Date: Synquella Williams

In The United States District Court
For The Middle District of Pennsylvania

Synquila Williams prose
Plaintiff
V.

Supplemental Complaint

John E. Wetzel Secretary of
Department of Corrections.

Judge John E. Jones III

David Radziewicz State

Department chief prea compliance
of the Department of corrections,

Paul Noel Department Chief medical

Clinical service director doctor, Former

Superintendent Robert Smith, & ^{now} Superintendent Debra Nicolas

Department Superintendent for
corrections, correct care solutions

Health care contract providers,

Blair morison SCI muncy corrections

officer Donoramana, SCI corrections

officer for muncy starks, SCI muncy

Psychologist mirranda dimoff

Defendants

I. Jurisdiction and Venue

1. Plaintiff, Synquila Williams is and was at all times
mentioned herein a prisoner of the State of Pennsylvania
in the custody of the Pennsylvania Department of

corrections. She is currently confined in SCI Muncy, in Muncy Pennsylvania. 2. Defendant's defendant, John E. Wetzel is secretary of the state of Pennsylvania Department of Corrections. He is legally responsible for the overall oversight operation and administration and implementation of policies training and adequate sanctions of the department and each facility under its jurisdiction, including SCI Muncy. 3. Defendant David Rodziewicz is the State wide Prea Prison Rape Elimination Act coordinator of the Pennsylvania Department of Corrections. He is legally responsible for the overall oversight and administration and adequate implementation of policies and training and to ensure all Prea standards are adhere to and ensure adequate sanctions of the department and each Institution under its jurisdiction including SCI Muncy. 4. Defendant, Paul Noel is the department chief medical clinical service director Doctor of the State of Pennsylvania. He is legally responsible for the adherence of policies and procedures and adequate implementation of medical services and overall oversight and operation and administration of the department and each institution under its jurisdiction including SCI Muncy.

5. Defendant, Robert Smith superIntendant of Sci muncy. He is legally responsible for the operation and oversight of administration and implimentation of adequate policies and procedures and training and sanctioning staff misconduct of Sci muncy and for the welfare of all inmates in that prison. 6. Correct care solution is a health care provider contracted with the pennsylvania Department of corrections who at all times mentioned in this complaint held the position of contracted health care providers and was assigned to Sci muncy.

7. Defendant, Donaronoma is a correctional Officer of the Pennsylvania Department of corrections who at all times mentioned in this complaint each department held the rank of a prison guard and was assigned to Sci muncy. 8. Defendant, Starks is a correctional officer of the State of Pennsylvania Department of corrections who at all times mention in this complaint held the rank of prison guard and was assigned to Sci muncy. 9. Defendant Mirranda Dimoff is a psychologist of the Pennsylvania department of corrections who at all times mentioned in this complaint held the position of Prison Psychologist and was assigned to Sci muncy.

Blair Morrison was head of medical.

And Debra Nicholas is the new super intendant

10. Each defendant is to be sued in their individually and in his/her official capacity. At all times mentioned in this complaint each defendant acted under the color of state law. 11. In this 42 U.S.C. 1983 and Civil rights action prose plaintiff synquida Williams a gay inmate who identifies as identity of male inmate in the custody of the Pennsylvania Department of corrections (DOC) alleges that Secretary John Wetzel and other officials and staff members of the Department of corrections collectively referred to as defendants are responsible for failing to implement Policies procedures and adequate training to ensure the safety of inmates and privacy of ms. Williams a gay women inmate, neglecting their clear constitutional obligations as well requirements set forth under Prison Rape Elimination Act (PREA) 42 U.S.C. 15601, et Seq. The doc has failed to prevent detect foreseeable ongoing harm severe harm to ms. Williams it has been more than 16 years since congress passed Prea to prevent the harm that ms. Williams continued to suffer by requiring prisons to adopt standards designed to detect and prevent sexual abuse and sexual harrasment. (sci muncy department of corrections however has failed to adhere to impliment Prea standards with respect to LGBTQ inmates or take constitutional required steps to prevent foreseeable harm to ms. Williams DC-ADM008 Page 21 - #2 28 C.F.R. 115.11 115.13 (c)

12. Defendant, Miranda Dimoff upon being interviewed I divulged my personal feelings and confided how I felt unsafe to CO Donoromona, CO Starks and I reported I kept being harassed and had known they would continue to target me after being sent to the RHU by them.
13. Defendant, Radziewicz all times mentioned in this complaint given the fact he had personal knowledge and allowed subordinates to fail to adequately investigate ms. Williams, allegations and maliciously and deliberately and grossly systematic suppression of the harm ms. Williams sustained was directly responsible as the position of Department Chief of PREA coordinator and failed to take constitutional steps required to prevent the harm ms. Williams sustained.
14. Defendant Paul Noel at all times mentioned in this complaint was relevant due to his position of Department chief of Clinical medical direct who is in charge of implementing policies and ensure his subordinates adhere to them as he has failed to do such as ms. Williams known condition in known and in need of surgery but has failed to adequate provide medical health care as ms. Williams remain in imminent medical health where life threatening.
15. Defendant, Correct Care Solutions at all times mentioned in this complaint was relevant. Due to precluded health care service derived by a Arbitrary cost effectency as this health care is known to precluded needed services as

ms. Williams health is known as life threatening without proper surgery as her colon is full of stool she is in a position due to the toxin where she can go into an organ failure and cause death behind this deprivation and ~~blatant~~ blatant refusal to provide surgery or allow proper medical assessment out of the institution as ms. Williams fell on active duty and in the kitchen and have massive contusion on the lower back and failed to do anything.

16. Defendant, Robert Smith at all times relevant and mention in this complaint as he had personal knowledge of ms. Williams allegation of rape given he is to review as a facility manager and deliberately neglected to follow constitutional required step rather instead acquiesced the foreseeable harm ms. Williams sustained as she followed procedural steps and was precluded immediate report to obtain physical evidence they made her humiliated by forced of pictures in her under clothes only to deliberately suppress her assault while ms. Williams pleaded her fear to defendant who failed to protect ms. Williams and allowed subordinate to harass ms. Williams and retaliate against her in response to reporting abuse and sexual harassment.

17. Defendant, Donoronama mentioned at all times in this complaint was relevant. He ~~was~~ harassed ms. Williams and lied on DC-ADM 801 141

reports to deliberate utilize and adverse action so ms. Williams could be placed in the RHU which is the Restricted Housing unit. After seeing the hearing hearing examiner it was dismissed and spent time to harass and retaliate for ms. Williams exercise of her 1st amendment right to petition the government for redress of grievances still it was a covert collective engagement as ms. Williams suffered from PTSD as a result of this hardship placed up her for the deliberate reckless sadistic and malicious intent and done grossly. 18. Defendant, Starks mentioned at all times in this complaint was relevant. Starks also Fabricated on DC-ADM 801 141 report collectively with defendants to assist as a cronie and done to harass ms. Williams as ms. Williams has document the abuse and sexual harrasment endured by this cruel and unusual punishment. Miranda Dimoff.

Exhaustion of Legal Remedies:

19. Plaintiff Syngula Williams used the prison grievance procedure available at SCI Muncy to try to resolve the problems and used the PREA report procedure to unfound her allegation. 20. Deliberate Indifference to the 8th Amendment: David Rodziewicz, John E. Wetzel, CO Starks Frey, CO Donororana. Diliberate indifference to a serious medical need: Paul Noel correct care solution.

21. Cruel and unusual punishment to the eighth amendment 22. Unsafe conditions and sexual discrimination 23. The plaintiff has no other way plain, adequate or complete remedy at law to redress the wrongs described herein. 24. Prayer for relief, where the plaintiff respectfully prays that this court enter judgement granting Plaintiff 25. A declaration that the acts and omissions described herein violated plaintiffs rights under the Constitution and laws of the United States. 26. To stop defendants from issuing retaliatory action when PREA reports are made, and order defendants to provide surgery of ms. Williams colon. 27. Compensatory damages. 28. Punitive damages 29. A jury trial on all issues triable by jury. 30. Plaintiff's costs in the suit. 31. any additional relief the courts deem just proper and equitable.

Date: September 5, 2019 Syngwila Williams
Respectfully submitted

Syngwila Williams
6454 State Route 405
Muncy PA 17554

Verification

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, I certify under penalty of Perjury that the foregoing is true and correct.

Executed at SCI muncy on 9-5-19

X Syngula Williams
signature

Adding to Miranda Dimoff,

I cried to her on numerous occasions about the harassment. And she did nothing I told her that I hate Co Downstream and Co started my unit manager at the time Mr Phereell and she broke confidentiality and told them what I said, which caused hell for me. And she said that it was a security issue. When I never said that I was going to harm anybody. And if it was a security issue she should have took it to security and not the people that I said it about. Causing more torture on my behalf

Adding to Super intendant Smith

I went to him on numerous occasion about my harassment. them lying on misconduct. He was at my job the same day that Stokes said that I didn't go to work and I asked him can he watch the cameras or verify that I was at work and he said that it was nothing that he could do that it was up to the hearing examiner. So therefore he let me go down for something that he could have prevented. When yall are ready for discovery let me know my mother will bring it to yall because the prison have correspondent for the governer with means that they opened my out going mail. My Mother has all of the request and appeals

that I sent to the super intendant trying to get help from the harassment and all my cries for help went on death years. And when I called prison they kept the girl on the same unit and she attacked me at lunch time.

Adding to ~~correct~~ care Solutions

I have all of the same problems that they supposed to have solved since I been here. Colon full of stool, Type 1 Diabetes Mellitus with Diabetic neuropathy. They don't check my sugar and they let me complain about my feet and leg pain for almost a year before they even told me that I had neuropathy. I went in the middle of the night with burning tingling and pain and nurse LYNN told me that it was normal signs of my neuropathy when I didn't even know that I had it. She said it was in my chart but they neglected to tell me. Now they give me 50 mg of Lyric that's not working. And I probably wouldn't even have neuropathy had they not left my toe infected for two years. I went out to the hospital July 19, 2017 and was told that I need to see a psychiatrist and I just seen them the beginning of this year. Diabetes II with unspecified complications. Hyperlipidemia unspecified. Schizoaffective Disorder, Bipolar type. I have never been schizoaffective before I believe they are saying that so that it can look like I'm crazy. And for nobody to believe me when I call the hot lines. But it's

20F5

Nothing wrong with me. I have all of my sense. Then it says that I have Schizoaffective disorder, Depressive type, Unspecified Depressive disorder, Major depressive disorder, Recurrent Episodes Unspecified, Unspecified Anxiety disorder, Migraines, Hypertension, Benign Hypertension Unspecified. All this says to me is that I'm under a lot of stress and I'm depressed. Rhinitis Allergic Cause unspecified, Asthma unspecified, Gastro-esophageal Reflux disease without esophagitis, I don't even know what this is and I'm most definitely not getting treated for this disease. Psoriasis, Pain in unspecified Foot (Neuropathy) Nausea w vomiting (Colon) And I learned that I have all of this by the consultation Record that came with my diabetic shoes. Hump in my back from Fall they said a xray show a muscle spasm

I would like to add Super Intendant Debra Nicholas She was the Super Intendant when they opened my legal mail and kept the originals. She was also the Superintendant when my identity was stolen and someone order a welfare access card in my name and God knows what else.

I would also like to add Blair Morrison Blair Morrison because she was head over medical and I wrote to her plenty of times and went to her plenty of time to get help and she never help me.

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① Discovery is in my Mothers possession. I didn't trust it
 here. I have all of my request reaching out for help from
 my harassment. I have all of my appeals. I have dates
 and times of every event. I have eye witness and their
 willing to testify. I have my misconducts for things that
 not in the inmate handbook. I have dates and times
 to look at camera footage. I have copies of every
 sick call that I wrote through carbon paper. I have
 all of my monthly statements of every time that they charge
 me for doing nothing. And all the computers of my psychologist
 should have all of the complaints about my harassment. Starts
 first misconduct that she wrote on ~~December~~¹²/20/16
 again 12/20/16 I got called to the hearing examiner on
 December 22, 2016 camera footage will show that starts
 walked down to the hear examiner with me and camera
 footage on S-unit will show that as soon as I left
 officers told my cellie to pack my stuff before I even
 seen the hearing examiner. And I have a written
 statement from my cellie proven so. Camera footage
 will also show that I got taken straight to the back
 where they keep you at in the rhu and had my hearing
 through a locked gate that your not suppose to see
 until after they find you guilty. And when I realized
 that nobody would run the cameras back for me to prove that
 I went to work I got 14 inmates name and number that saw
 me come to work the hearing examiner drop that charge but still

kept me in the Rhu because I asked Starks why wasn't she letting me go to work. My Discovery is well put together and available when needed. I have some copies here but my mother has everything when the time comes. And I will be putting in a motion for the defendants Discovery.

X Sepatula Williams

And I say et and al because it quickly became to many officers for me to name. But I will be sending all of my grievances and date and time for them as well. While in the Rhu I was denied Food and tortured the whole time that I was down there. And when I put a sheet around my neck because I couldn't take no more instead of them taking me to POC they took me to a regular Rhu block and took all of my clothes and had everybody at their door watching me and asking me all kinds of questions. Adding to my humiliation, Torture, and embarrassment. So it is way more than the two for harassment they all stick together and it becomes a domino effect. Thank you for your attention on this matter and have a blessed day.